

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHARO GAIA FUND, LTD. and PHARO
MACRO FUND, LTD.,

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 19-cv-3123 (AT)
Related to 18-cv-11940 (AT)

CASA EXPRESS CORP, as Trustee of CASA
EXPRESS TRUST,

Plaintiff,

v.

THE BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 18-cv-11940 (AT)
Related to 19-cv-3123 (AT)

NOTICE OF CONSOLIDATED MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying consolidated Memorandum of Law, dated December 5, 2019, the accompanying Declarations of Jeffrey Hanlon and Luis Edgardo Gamardo Medina, and the Joint Declaration of Matthew D. McGill and Jeremy L. Wallison, all dated December 5, 2019, Plaintiffs Pharo Gaia Fund, Ltd., Pharo Macro Fund, Ltd., and Casa Express Corp, as Trustee of Casa Express Trust, by and through their undersigned counsel, make a consolidated motion to this Court before the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting summary judgment on all of Plaintiffs' claims in favor of Plaintiffs pursuant to Federal Rule of Civil Procedure 56, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the July 8, 2019 Scheduling Order entered in these actions (19-cv-3123, ECF No. 26; 18-cv-11940, ECF No. 46), Defendant's opposition is to be filed along with any cross-motion for a stay by January 16, 2020, Plaintiffs' consolidated reply in support of their motion for summary judgment is to be filed and served along with their opposition to Defendant's cross-motion for a stay by February 6, 2020, and Defendant's reply in support of its cross-motion for a stay is to be filed by February 27, 2020.

Dated: December 5, 2019

Respectfully submitted,

/s/ Jeremy L. Wallison

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